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September 14, 2022

Via Electronic Case Filing

The Honorable Vincent L. Briccetti
United States District Court
Southern District of New York
United States Courthouse
300 Quarropas Street, Courtroom 630
White Plains, New York 10601

Re: *White Plains Aviation Partners, LLC, d/b/a Million Air White Plains v.
The County of Westchester*, Case No. 21 Civ. 5312 (VB)

Dear Judge Briccetti:

This firm represents plaintiff White Plains Aviation Partners, LLC, d/b/a Million Air White Plains (“Million Air”), in the above-referenced action. We write to request a one-month extension of the remaining deadlines for fact and expert discovery set forth in the Court’s Revised Civil Case Discovery Plan and Scheduling Order (Dkt. No. 54) (“Revised Scheduling Order”). Defendant the County of Westchester consents to this request.

Under the Revised Scheduling Order, fact discovery is to be completed by October 14, 2022, expert discovery by December 1, 2022, and all discovery by December 14, 2022. To date, the parties have served and responded to written discovery requests, engaged in document production, and conferred on several discovery issues. Given the significant volume of electronic discovery, Million Air requires additional time to complete its ongoing production. In addition, because it would be most efficient to take depositions after the completion of document discovery, the parties have agreed to defer depositions until that process is completed. Finally, Million Air’s motion to amend the complaint currently is *sub judice*, and the Court’s resolution of that motion will guide the parties as to the scope of remaining discovery.

Accordingly, Million Air requests that the Court extend by one month the remaining deadlines for fact and expert discovery set forth in the Revised Scheduling Order, such that all discovery in the case would be completed by January 17, 2023. Per the Court’s Individual Practices, a proposed Second Revised Civil Case Discovery Plan and Scheduling Order is attached. This is the second request for an extension of the discovery deadline in this matter. By Order dated July 26, 2022, the Court granted the parties’ request for a two-month extension of that deadline.

Hon. Vincent L. Briccetti
September 14, 2022
Page 2 of 2



We thank the Court for its consideration of this request.

Respectfully submitted,

YANKWITT LLP
Counsel for Million Air

By: /s/ Ross E. Morrison
Russell M. Yankwitt
Ross E. Morrison

(via ECF)
cc: All counsel of record